

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

**KRISTINA RAPUANO, VASSIKI
CHAUHAN, SASHA BRIETZKE,
ANNEMARIE BROWN, ANDREA
COURTNEY, MARISSA EVANS, JANE
DOE, JANE DOE 2, and JANE DOE 3,**

*Plaintiffs, on behalf of themselves and all
others similarly situated,*

v.

TRUSTEES OF DARTMOUTH COLLEGE,

Defendant.

CASE NO. 1:18-cv-01070 (LM)

Expedited Treatment Requested

**PLAINTIFFS' ASSENTED-TO MOTION TO EXTEND STAY AND DEADLINE FOR
SUBMISSION OF SETTLEMENT DOCUMENTS**

Plaintiffs now come before the Court to request a 15-day extension of the deadline to file a signed stipulation and agreement of settlement and proposed schedule. In support of this motion, undersigned counsel for Plaintiffs state as follows:

1. On August 6, 2019, the Court granted the Parties' Joint Motion to Extend the Stay to Allow Submission of Settlement Documents [ECF 41], thereby extending the previously entered stay of all deadlines to permit the parties to submit a signed settlement agreement and proposed schedule by August 20, 2019.

2. The parties have since been engaged in diligent efforts to finalize the settlement documents to meet the August 20, 2019 deadline. However, due to the large number of Plaintiffs and existing travel and other logistical challenges, Plaintiffs require additional time to finalize the settlement documents.

3. Pursuant to Local Rule 7.1(c), the undersigned conferred with counsel for Defendant and Defendant concurs with the relief sought in this motion.

WHEREFORE, to allow sufficient time to finalize the settlement documents, Plaintiffs respectfully request that the deadline for submitting the signed stipulation and agreement and proposed schedule be extended by 15 days from August 20, 2019 to September 4, 2019 and that the Court extend the stay of this litigation until that date.

Respectfully Submitted,

By: /s/ Deborah K. Marcuse
Deborah K. Marcuse (admitted *pro hac vice*)
Steven J. Kelly (admitted *pro hac vice*)
Austin L. Webbert (admitted *pro hac vice*)
SANFORD HEISLER SHARP, LLP
111 S. Calvert Street, Suite 1950
Baltimore, MD 21202
Telephone: (410) 834-7415
Facsimile: (410) 834-7425
dmarcuse@sanfordheisler.com
skelly@sanfordheisler.com
awebbert@sanfordheisler.com

Dated: August 20, 2019

David W. Sanford (admitted *pro hac vice*)
Nicole E. Wiitala (admitted *pro hac vice*)
SANFORD HEISLER SHARP, LLP
1350 Avenue of the Americas, 31st Floor
New York, New York 10019
Telephone: (646) 402-5650
Facsimile: (646) 402-5651
dsanford@sanfordheisler.com
nwiitala@sanfordheisler.com

Charles G. Douglas, III (N.H. Bar ID #669)
DOUGLAS, LEONARD & GARVEY, P.C.
14 South Street, Suite 5
Concord, NH 03301
Telephone: (603) 224-1988
Fax: (603) 229-1988
chuck@nhlawoffice.com

*Attorneys for Plaintiffs and
the Proposed Class*